Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 11 of the Commission's Rules Regarding the Emergency Alert System	)	PS Docket No. 15-94

REPLY COMMENTS OF MONROE ELECTRONICS
IN REGARDS TO THE NOTICE OF PROPOSED RULEMAKING

We respectfully submit the below reply comments in order to highlight several areas of consensus among commentators to the above captioned proceeding, and to offer alternative viewpoints to certain assertions by other commentators.

The record clearly indicates that many knowledgeable and experienced figures in the public warning community support the maintenance of the EAS relay, though elements of that system may need to be improved, whether through modest enhancements to the existing EAS protocol schema, or the eventual incorporation of a more modern and capable data protocol.[1] The record also

[1] *Zeigler Comments* at p.2 ("Allowing both strengthens the entire system.") and p.3. ("Legacy EAS and IPAWS should be retained for redundancy."). See also *Comments of the Federal Emergency Management Agency (FEMA) Integrated Public Alert and Warning System (IPAWS) Program Management Office (PMO), Washington SECC Comments*, p 35. *Rudman Comments*, at p.1. *Monroe Electronics Comments*, at pp.8-10, *Sage Comments* at p 8.

shows support for the re-establishment of the NAC, or creation of a similar body, to examine these areas of potential improvement. Most supporting the reconstitution of the NAC appear to feel that it should be reconstituted as a more autonomous and more broadly-based entity in terms of industry representation, a stance with which we agree.[2]

The record also shows support among several commentators for the polling methodology proposed by Monroe Electronics, which would enable an EAS device to immediately poll the IPAWS-OPEN system upon receipt of any broadcast EAS message. During informal discussions with government representatives and others at the NAB annual conference (April 2016), we initially suggested a methodology of enabling EAS devices to immediately poll the IPAWS-OPEN system in response to a received broadcast EAS message. This methodology was presented in further detail in our previous Comments to this Notice.[3] We feel this proposed polling methodology is a significant enhancement to EAS capabilities that can be supported by software update to existing CAP/EAS encoder/decoders.

At least two commentators to the Commission's Notice have filed comments in substantial agreement with our proposed approach to promoting such an "IP first" capability.[4] This proposed approach would resolve multiple issues,

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[2] *Zeigler Comments* at p.2 ("The NAC should be reestablished as an autonomous authority where all agencies involved in alerting can meet on common, neutral, ground facilitated by the NAC."). See also *National Weather service comments to the NPRM PS Dockets 15-94 and 15-91*, *Abbot Comments*. *Rudman Comments*.

[3] *Comments of Monroe Electronics, Inc. in Regards to the Notice of Proposed Rulemaking on the Emergency Alert System* (Docket 15-94), at pp. 7-15.

[4] *Comments of Gary E. Timm*, at p. 50. *Sage Comments* at p. 8.

including the ability of the EAS Participant to almost immediately obtain the presumably more informative CAP message even if the conventional EAS message arrives first, meaning that the EAS Participant can avail itself of a message that may be (1) more informative and detailed than the conventional FSK-based EAS message, (2) more usable content for those with accessibility requirements, and (3) emergency information in multiple languages. As such, Monroe Electronics urges the Commission to adopt the recommendation of each of these parties that EAS/CAP devices perform an automatic poll of IPAWS-OPEN in response to the receipt of a broadcast EAS message in order to determine if there is a corresponding CAP message, and to permit the EAS Participant to utilize the equivalent and presumably more informative CAP message should one be present.

We also note a certain degree of concern or confusion over the topic of multilingual EAS alerting, or making EAS alerts more accessible to non-English speakers. Certain commentators have asserted the unavailability of technologies that may make EAS alerts more accessible to non-English speakers.[5] We wish to add to the record to reflect that, in fact, there are extant technologies that allow alert originators and EAS participants to help make EAS alerts more accessible to non-English speakers. As one example, FEMA has issued bilingual CAP messages as part of its ongoing series of regional tests of the NPT event code.[6] These messages consisted of a CAP-formatted XML

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[5] See for example, the Amended Comments of the Boulder Regional Emergency Telephone Service Authority, p.7.

[6] Susan Ashworth, "IPAWS Completes First Bilingual EAS Test," November 18, 2015, http://www.radioworld.com/article/ipaws-completes-first-bilingual-eas-test/277548; Leslie

message with two <info> blocks: one in English, and a second in Spanish. The bilingual CAP message also included audio resource files in both languages, embedded within the CAP message itself. Upon receipt of this bilingual CAP message, language-enabled EAS equipment at EAS Participant facilities were able to transmit the message in either - or both – languages, voluntarily and at their discretion.[7] In addition, there are initial capabilities that also enable EAS Participants with an ability to not only transmit multi-lingual alerts as provided by the alert originator, but also to automatically generate EAS messages in a variety of languages that may not have been provided in the message sent by the alert originator..

However, we stress that some technologies and approaches for multilingual alert accessibility are at their very beginning stages. We strongly feel that any additional regulation or action by the Commission would be premature at this time. Additionally, because the very early stage of development and experimentation, we caution that the experimental use of such technologies should be *voluntary* and at the discretion of the EAS originator, and the various EAS Participants.

Stimson, "FEMA IPAWS Sends First Multilingual NPT EAS Test," November 18, 2015. http://rbr.com/fema-ipaws-sends-first-multilingual-npt-eas-test/

[7] See Susan Ashworth, "IPAWS Completes First Bilingual EAS Test," November 18, 2015, http://www.radioworld.com/article/ipaws-completes-first-bilingual-eas-test/277548; Leslie Stimson, "FEMA IPAWS Sends First Multilingual NPT EAS Test," November 18, 2015. http://rbr.com/fema-ipaws-sends-first-multilingual-npt-eas-test/.

From several comments in this proceeding, we observed possible confusion over the capabilities of the many Emergency Notification System ("ENS") tools currently at the disposal of state and local authorities, many of which are IPAWS conformant and capable of forwarding CAP-based messages into IPAWS-OPEN for simultaneous dissemination via CAP EAS and WEA. Some states and local jurisdictions utilize integrated ENS capabilities that enable simultaneous activation of public warning assets via IPAWS as well as the local the broadcast EAS.[8] ENS tools such as the DASEOC (used by 9 states and numerous counties) enable alert originators to cost-effectively interoperate with both the Emergency Alert System (EAS) and FEMA's IPAWS-OPEN. The DASEOC both interfaces with IPAWS, and enables simultaneous local origination of broadcast EAS, form the same workflow, without unnecessary message duplication.

We therefore do not agree with the suggestion by one commentator that emergency notification systems do not exist that can activate EAS, CAP, WEA and local alerting systems from "a single message." To the contrary, there are numerous tools at the disposal of local authorities which can provide a unified system for simultaneous local ENS, EAS and IPAWS CAP activation. We also respectfully disagree with the assertion that EAS is in part not useful for local alerting until it can be activated by local officials as expeditiously as ENS ("e.g.,

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[8] For example, see "*Implementing IPAWS in Sedgwick County, Kansas with the DASEOC*," Digital Alert Systems (2012) http://www.digitalalertsystems.com/pdf/Implementing%20IPAWS%20in%20Sedgwick%20County.pdf. Also see "*Texas DPS Installs Digital Alert Systems Equipment To Handle Statewide Emergency Alerts*," Homeland Security Today (7 May 2014) http://www.hstoday.us/channels/fema/single-article-page/texas-dps-installs-digital-alert-systems-equipment-to-handle-statewide-emergency-alerts/3fd9162b9198cb183d39174128c7faae.html.

without creating a separate message through a separate system and waiting for approvals to use EAS"). We point out that many ENS products provide a single system to activate both WEA and EAS via IPAWS-OPEN. As one example, our own DASEOC™ system is an ENS capable of simultaneously activating WEA and EAS via IPAWS-OPEN, local conventional audio-based EAS, as well as other third-party local systems. In sum, many ENS solutions currently in use by local jurisdictions do in fact already integrate with CAP EAS.

Monroe Electronics thanks the Commission for its substantive questions relating to the Emergency Alert System, and urges the careful consideration of the positions we have offered in both our previous Comments and these Reply Comments as the Commission endeavors to improve the nation's public warning capabilities.

Respectfully submitted,

MONROE ELECTRONICS, INC.

/s/ *Edward* Czarnecki
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